

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LTL MANAGEMENT LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.
RICHARD LAWRENCE KRADIN, AND DR.
JOHN COULTER MADDOX

Defendants.

DOCKET NO.: 3:23-CV-03649-MAS-RLS

CIVIL ACTION

APPLICATION BY CONSENT BY
DEFENDANTS FOR EXTENSION OF TIME
TO ANSWER, MOVE OR OTHERWISE
RESPOND PURSUANT TO L. RULE 6.1(b)

Defendants Dr. Theresa Swain Emory, Dr. Richard Lawrence Kradin, and Dr. John Coulter Maddox, (collectively, “Defendants”) respectfully move the Court for an order pursuant to Local Rule 6.1(b) granting an extension to September 15, 2023 to answer, move or otherwise respond to plaintiff’s Complaint and in support thereof aver as follows:

1. On July 7, 2023, Plaintiff, LTL Management, LLC (“Plaintiff”), commenced this action against Defendants (Dkt#1) and Summons were issued (Dkt#3).

2. Named Defendants subsequently were served and their responsive pleadings are currently due on or about August 1, 2023 (Maddox), August 9, 2023 (Emory) and August 4, 2023 (Kradin). See Dkt#s 4 – 6)

3. Undersigned counsel was recently retained and seeks additional time to investigate and prepare a complete and full response to the Complaint.

4. Counsel for Plaintiff, Peter C. Harvey, Esquire, Patterson Belknap & Tyler, LLC, has kindly agreed to the extension of time to answer, respond or move to September 15, 2023 for all three Defendants.

5. This is the first request for an extension sought by Defendants.

WHEREFORE, Defendants respectfully request that the Court enter the annexed order extending the time in which Defendants must answer, move or otherwise respond to September 15, 2023.

Dated: Tuesday, August 1, 2023

Respectfully submitted,

SHERMAN, SILVERSTEIN, KOHL,
ROSE & PODOLSKY, P.A.

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Attorney for Defendants